

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

VS.

ANTHONY SMITH

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CRIMINAL ACTION

20-368

AND NOW, this day of , 2021, it is hereby
ORDERED that the trial date be continued and all pretrial deadlines are extended.

BY THE COURT:

HONORABLE JUAN R. SANCHEZ

PAUL J. HETZNECKER, ESQUIRE

Attorney I.D. No. 49990

1420 Walnut Street, Suite 911

Philadelphia, PA 19102

(215) 893-9640

Attorney for Defendant, Anthony Smith

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

VS.

ANTHONY SMITH

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CRIMINAL ACTION

20-368

MOTION TO CONTINUE TRIAL DATE

**TO THE HONORABLE JUAN R. SANCHEZ, JUDGE OF THE UNITED STATES
DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA:**

Anthony Smith, by and through his attorney Paul J. Hetznecker, Esquire, files this Motion to Continue Trial Date in the above matter and submits the following in support thereof:

1. The trial in this matter is scheduled to begin on September 13, 2021. Counsel respectfully requests a continuance in this matter.
2. Co-Counsel Worrell D. Nero, Esquire filed a Motion for Continuance of Trial Date on August 10, 2021. Counsel for Anthony Smith did not oppose the motion.
3. Counsel for Defendant Anthony Smith files the instant motion separately for the reasons set forth below:
 - a. Counsel for Defendant Anthony Smith is scheduled to begin trial before Your Honor on October 4, 2021 in United States v. Davis, et al. As Your Honor is aware the discovery is voluminous in that case and therefore, Counsel needs the next several weeks to

prepare for trial in that matter.

b. Additionally, Counsel for Anthony Smith filed a Motion to Compel in this case seeking further discovery from the government. Counsel has yet to receive the requested discovery. Therefore, Counsel needs additional time to obtain the necessary discovery in this matter well before trial.

5. This request for a continuance is submitted in order to serve the interests of justice and effective assistance of counsel. Furthermore, the time granted for this extension is "excludable time" pursuant to 18 U.S.C. § 3161(h)(1)(F) of the Speedy Trial Act.

WHEREFORE, Counsel for the defendant, Anthony Smith, respectfully requests that the trial date in this matter be continued.

Respectfully submitted,

/s/ Paul J. Hetznecker, Esquire

Paul J. Hetznecker, Esquire
Attorney for Defendant, Anthony Smith

DATE: August 20, 2021

CERTIFICATE OF SERVICE

I, Paul J. Hetznecker, hereby certify that a true and correct copy of **MOTION TO CONTINUE TRIAL DATE** was served on the following via the Court's electronic filing system (ecf):

**Amanda R. Reinitz, Esquire
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106**

/s/ Paul J. Hetznecker, Esquire
Paul J. Hetznecker, Esquire
Attorney for Defendant, Anthony Smith

DATE: August 20, 2021